

DICKSTEIN SHAPIRO MORIN & OSHINSKY LLP

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16158.008

EX PARTE OR LATE FILED

March 21, 1997

MAR 21 1997

VIA COURIER

William F. Caton, Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

EX PARTE CONTACT

Re: **Pacific Telesis' CEI Plan for Pay Telephone Services,**
CC Docket No. 96-128

Dear Secretary Caton:

On March 19, 1997, Vincent Townsend of Pay Tel Communications, Inc., Barry Selvidge of InVision Telecom, Inc., and the undersigned, on behalf of the Inmate Calling Service Providers Coalition ("ICSPC"), met with Carol Matthey, Deputy Chief of Policy and Program Planning Division, Common Carrier Bureau, and Staff Attorneys Craig Brown, Michelle Carey, Christopher Heimann, Radhika Karmarkar, Linda Kinney, Brent Olson and Michael Pryor to discuss issues on the record. The attached summary was distributed.

If you desire any further information, please contact the undersigned.

Sincerely,

Robert F. Aldrich 10ms

Albert H. Kramer
Robert F. Aldrich

Counsel to ICSPC

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cc: Carol Matthey, Esq. (w/o attachment)
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FCC MUST REQUIRE BELL COMPANIES TO CORRECTLY DEFINE
INMATE CALLING SERVICE (ICS) IN THEIR PAYPHONE CEI PLANS

- ◆ While most of the Bell Companies continue to evade the issue, Bell Atlantic clearly states it does not define collect calling service as part of its nonregulated inmate calling service (ICS) operation.
- ◆ Collect calling is as fundamental to ICS as coin calling is to public payphone service.
- ◆ Section 276 defines "payphone service" to include ". . . the provision of inmate telephone service in correctional institutions, and any ancillary services." 47 U.S.C. § 276.
- ◆ Nonregulated ICS must be defined to include collect calling service or subsidies and discrimination will continue, contrary to Section 276.

BELL ATLANTIC'S APPROACH VIOLATES SECTION 276

- ◆ Bell Atlantic's nonregulated ICS operation will hand off collect inmate calls to regulated network operator functions.
- ◆ The regulated network operator functions will not be purchased under tariff and resold by Bell Atlantic's nonregulated ICS operation. The regulated side will simply pay a commission to Bell Atlantic's nonregulated ICS operation.
- ◆ Bell Atlantic's side will bear all the risk associated with collection of inmate call charges -- which have a much higher percentage of uncollectibles than other regulated services.
- ◆ Bell Atlantic's regulated side will pay the costs of transmitting and processing calls
 - network usage
 - operator call processing
 - validation
 - billing and collection
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- ◆ Bell Atlantic's regulated side will be able to continue commingling ICS "uncollectibles" and costs with uncollectibles for regulated services, while independent ICS providers must pay their own way
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William F. Caton, Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

EX PARTE CONTACT

Re: **Southwestern Bell's CEI Plan for Pay Telephone Services,**
CC Docket No. 96-128

Dear Secretary Caton:

On March 19, 1997, Vincent Townsend of Pay Tel Communications, Inc., Barry Selvidge of InVision Telecom, Inc., and the undersigned, on behalf of the Inmate Calling Service Providers Coalition ("ICSPC"), met with Carol Matthey, Deputy Chief of Policy and Program Planning Division, Common Carrier Bureau, and Staff Attorneys Craig Brown, Michelle Carey, Christopher Heimann, Radhika Karmarkar, Linda Kinney, Brent Olson and Michael Pryor to discuss issues on the record. The attached summary was distributed.

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March 21, 1997

VIA COURIER

William F. Caton, Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

EX PARTE CONTACT

Re: **U S WEST's CEI Plan for Pay Telephone Services,**
CC Docket No. 96-128

Dear Secretary Caton:

On March 19, 1997, Vincent Townsend of Pay Tel Communications, Inc., Barry Selvidge of InVision Telecom, Inc., and the undersigned, on behalf of the Inmate Calling Service Providers Coalition ("ICSPC"), met with Carol Matthey, Deputy Chief of Policy and Program Planning Division, Common Carrier Bureau, and Staff Attorneys Craig Brown, Michelle Carey, Christopher Heimann, Radhika Karmarkar, Linda Kinney, Brent Olson and Michael Pryor to discuss issues on the record. The attached summary was distributed.

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March 21, 1997

VIA COURIER

William F. Caton, Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

EX PARTE CONTACT

Re: **Ameritech's CEI Plan for Pay Telephone Services,**
CC Docket No. 96-128

Dear Secretary Caton:

On March 19, 1997, Vincent Townsend of Pay Tel Communications, Inc., Barry Selvidge of InVision Telecom, Inc., and the undersigned, on behalf of the Inmate Calling Service Providers Coalition ("ICSPC"), met with Carol Matthey, Deputy Chief of Policy and Program Planning Division, Common Carrier Bureau, and Staff Attorneys Craig Brown, Michelle Carey, Christopher Heimann, Radhika Karmarkar, Linda Kinney, Brent Olson and Michael Pryor to discuss issues on the record. The attached summary was distributed.

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William F. Caton, Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

EX PARTE CONTACT

Re: **NYNEX's CEI Plan for Pay Telephone Services,**
CC Docket No. 96-128

Dear Secretary Caton:

On March 19, 1997, Vincent Townsend of Pay Tel Communications, Inc., Barry Selvidge of InVision Telecom, Inc., and the undersigned, on behalf of the Inmate Calling Service Providers Coalition ("ICSPC"), met with Carol Matthey, Deputy Chief of Policy and Program Planning Division, Common Carrier Bureau, and Staff Attorneys Craig Brown, Michelle Carey, Christopher Heimann, Radhika Karmarkar, Linda Kinney, Brent Olson and Michael Pryor to discuss issues on the record. The attached summary was distributed.

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William F. Caton, Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

EX PARTE CONTACT

Re: **BellSouth's CEI Plan for Pay Telephone Services,**
CC Docket No. 96-128

Dear Secretary Caton:

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